

From: [Rose Longoria](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#)
Cc: [Sheila Fleming](#)
Subject: [Fwd: FW: HHRA comments - 1/2/08 followup]
Date: 01/02/2008 04:10 PM

Hi Eric -

It seems that the table you referred to does not include shellfish in the calculation of cumulative risk to Native Americans. See below...

~rose

----- Original Message -----

Subject: FW: HHRA comments - 1/2/08 followup
Date: Wed, 2 Jan 2008 15:33:43 -0800
From: Sheila Fleming <sheila@ridolfi.com>
To: 'Rose Longoria' <rose@yakama.com>

Rose,

Please see Item No. 3 below regarding shellfish consumption and Native American cumulative risks.

Thanks, Sheila

From: Kristin Cunningham [<mailto:kristin@ridolfi.com>]
Sent: Wednesday, January 02, 2008 2:16 PM
To: Sheila Fleming
Subject: HHRA comments - 1/2/08 followup

Regarding the three issues we discussed after today's TCT call:

1) SW - okay: as long as they are collecting a depth-integrated surface water sample (which is a composite of the epi, meta, and hypolimnion, all of which are generally well mixed in rivers anyway), then it's not necessary to collect a separate sample at depth.

2) Seeps - okay: if land use areas are definitive (e.g., forever industrial with no recreational beach access), it may be appropriate to consider that pathway within limited scenarios.

3) **Clams - NOT okay:** According to AppF Table 5-59, cumulative risk for the Native American scenarios (bank and boat fishers) does NOT include shellfish (nor for transients). We believe that, although little is known about tribal consumption rates, there is evidence that tribal fishers do consume shellfish, and this pathway cannot be arbitrarily disregarded for the tribes associated with Portland Harbor.

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Kristin L. Cunningham
Risk Assessor

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